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*Attorneys for defendants Inbound Call Experts,
LLC; Advanced Tech Supportco, LLC; PC
Vitalware, LLC; Super PC Support, LLC; Robert D.
Deignan; Paul M. Herdsman; Justin M. Wright;
and Scott Grushoff*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ORNELLA ZOINO,

Plaintiff,

Civil No. _____

vs.

INBOUND CALL EXPERTS, LLC, a Florida
Limited Liability Company d/b/a Advanced Tech
Support; ADVANCED TECH SUPPORTCO, LLC,
a Florida Limited Liability Company; PC
VITALWARE, LLC, a Florida Limited Liability
Company; SUPER PC SUPPORT, LLC, a Florida
Limited Liability Company; JOEL VILLACRUZ;
ROBERT D. DEIGNAN; PAUL M. HERDSMAN;
JUSTIN M. WRIGHT; and SCOTT GRUSHOFF,

Defendants.

**NOTICE OF REMOVAL
OF CIVIL ACTION**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1441 and 1446, the action entitled *Ornella Zoino v. Inbound Call Experts, LLC, et al.*, commenced in the Superior Court of the State of New Jersey, Law Division, Essex County, Docket No. ESX-L-4311-15, is removed by defendants Inbound Call Experts, LLC d/b/a Advanced Tech Support; Advanced Tech Supportco, LLC; PC Vitalware, LLC; Super PC Support, LLC; Robert D. Deignan; Paul M. Herdsman; Justin M. Wright; and Scott Grushoff (collectively “Defendants”), from the Superior

Court of the State of New Jersey, Law Division, Essex County, to the United States District Court for the District of New Jersey by the filing of this Notice of Removal with the Clerk of the United States District Court for the District of New Jersey.

In support of removal, Defendants, by and through their attorneys, respectfully state the following grounds for removing this action:

1. Defendants remove this action to this Court pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446.
2. On or about June 22, 2015, plaintiff Ornella Zoino (“Plaintiff”) commenced the action entitled *Ornella Zoino v. Inbound Call Experts, LLC, et al.*, Docket No. ESX-L-4311-15 in the Superior Court of the State of New Jersey, Law Division, Essex County (the “State Court Action”), with the filing of a complaint. A copy of the complaint in the State Action is annexed hereto as Exhibit A.
3. In her complaint, Plaintiff demands judgment against defendants, jointly and severally, for injunctive relief, compensatory and punitive damages, interest, attorney’s fees and costs, and asserts causes of action against defendants for, inter alia:
 - a. Violation of the New Jersey Act Concerning Civil for Computer-Related Offenses, N.J.S.A. 2A:38A-1 et seq.;
 - b. Violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030(a)(2);
 - c. Violation of the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq.;
 - d. Violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 et seq.;
 - e. Common law fraud;
 - f. Conversion; and
 - g. Trespass to chattel.

4. On or about June 30, 2015, the Summons and Complaint was served on Defendants via substituted service. A copy of the order authorizing substituted service is annexed as Exhibit B hereto.

5. To date, we are unaware as to whether Plaintiff has served Joel Villacruz with the complaint in the State Court Action.

6. This Notice of Removal is being filed within thirty (30) days after receipt by Defendants of the complaint in the State Court Action and, therefore, is timely filed pursuant to 28 U.S.C. § 1446(b).

7. Copies of all the process, pleadings and orders served on Defendants are annexed hereto as Exhibit A and Exhibit B.

8. No further proceedings have been had in the State Court Action.

9. The Superior Court of New Jersey, Essex County is located in the District of New Jersey.

10. This Court has original jurisdiction over this action based on diversity of citizenship pursuant to 28 U.S.C. § 1332.

11. This is a civil action in which the matter in controversy should exceed the sum of \$75,000, exclusive of interest and costs.

12. As alleged in the complaint in the State Court Action, Plaintiff was and is a resident and citizen of the State of New Jersey. See Exhibit A, ¶ 1.

13. Defendant Inbound Call Experts, LLC d/b/a Advanced Tech Support is a Florida limited liability company, has its principal place of business in Boca Raton, Florida and is a citizen of the State of Florida.

14. Defendant Advanced Tech Supportco, LLC is a Florida limited liability company, has its principal place of business in Boca Raton, Florida and is a citizen of the State of Florida.

15. Defendant PC Vitalware, LLC is a Florida limited liability company, has its principal place of business in Boca Raton, Florida and is a citizen of the State of Florida.

16. Defendant Super PC Support, LLC is a Florida limited liability company, has its principal place of business in Boca Raton, Florida and is a citizen of the State of Florida.

17. Defendant Robert D. Deignan is a citizen of the State of Florida.

18. Defendant Paul M. Herdsman is a citizen of the State of Florida.

19. Defendant Justin M. Wright is a citizen of the State of Florida.

20. Defendant Scott Grushoff is a citizen of the State of Florida.

21. Upon information and belief, as alleged in the complaint, defendant Joel Villacruz is a citizen of the Philippines. See Exhibit A, ¶ 4.

22. No defendant in this action is a citizen of the State of New Jersey.

23. Accordingly, complete diversity of citizenship exists between Plaintiff, on the one hand, and Defendants and defendant Joel Villacruz, on the other hand.

24. Accordingly, there is complete diversity of citizenship between the Plaintiff and the Defendants.

25. Removal is, therefore, appropriate pursuant to 28 U.S.C. §§ 1441 and 1446.

26. A true and complete copy of this Notice of Removal, with a copy of the pleadings will be forwarded to the Superior Court of New Jersey, Essex County.

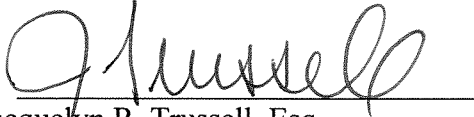
27. Based on the foregoing, Defendants respectfully requests that this matter be removed to this Court, enter an Order from the Superior Court of New Jersey, Essex County, and

transferring same to the United States District Court for the District of New Jersey, Newark Division.

WHEREFORE, defendants Inbound Call Experts, LLC d/b/a Advanced Tech Support; Advanced Tech Supportco, LLC; PC Vitalware, LLC; Super PC Support, LLC; Robert D. Deignan; Paul M. Herdsman; Justin M. Wright; and Scott Grushoff remove this action, currently docketed in the Superior Court of New Jersey Law Division, Essex County, Docket No. ESX-L-4311-15, to the United States District Court for the District of New Jersey, and requests that the United States District Court for the District of New Jersey assume complete jurisdiction over this action and exclude any further proceedings in the Superior Court of New Jersey Law Division, Essex County.

Dated: July 31, 2015

HODGSON RUSS LLP

By: 
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Attorneys for defendants Inbound Call Experts, LLC; Advanced Tech Supportco, LLC; PC Vitalware, LLC; Super PC Support, LLC; Robert D. Deignan; Paul M. Herdsman; Justin M. Wright; and Scott Grushoff